

**IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MARYLAND  
BALTIMORE DIVISION**

In re: Gregory C. Lasek

Case No.: 11-25816

Chapter 7 Trustee: Joseph Bellinger

Debtor(s)

**MOTION TO REOPEN CASE**

The Debtor, Gregory C. Lasek by and through his Counsel Theodore Nkwenti, moves this Honorable Court to reopen the above entitled case and in support states as follows:

1. The Debtor filed a petition for relief under chapter 7 of title 11 of the United States Code on August 2, 2011.
2. A Final Decree and Discharge closing the Bankruptcy case as a "no asset" case was filed in this Honorable Court on October 21, 2013. Nonetheless, it is our position that this debt was still Discharged by operation of law where a no-asset case, the debt was unsecured, and where no fraud or other bad conduct exceptions appear to be in order. Some core Maryland Bankruptcy cases and intentions of a Chapter 7 Section 727 Discharge and a corresponding lack of actual prejudice to the unlisted, unsecured creditor in a no-asset case.
3. The Debtor wishes to reopen this case as Debtor had received a collection notice on behalf of one of his creditors, Sharon L. Snyder by and through her counsel and have repeatedly received threaten notices and phone calls to pursue further legal action and to enforce a bodily attachment on the Debtor. This debt was inadvertently omitted at the time of filing the Chapter 7 Bankruptcy case. A copy of the notice is attached hereto as (Exhibit A).
4. Section 350(b) of the Bankruptcy Code authorizes this Court to reopen a case to administer assets, to accord relief to the Debtors, or for other cause.
5. Debtor has paid the appropriate filing fee to reopen the case.



**WHEREFORE**, the Debtor requests an Order directing that this case be reopened to allow the Debtor relief under the automatic stay and granting such other and further relief as is appropriate.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY on this 1st day of October, 2015, a copy of the Motion to Reopen Case was filed in the Honorable Court CM/ECF, and the Motion was also mailed first class, postage prepaid to the following: Chapter 7 Trustee, Joseph J. Bellinger, 300 E. Lombard Street, Suite 2010, Baltimore, Maryland, Gregory Lasek, Debtor, 418 Overview Avenue, Baltimore, Maryland 21224 and Gerard P. Uehlinger, P.C., Suite 1210, 28 West Allegheny Avenue, Towson, Maryland 21204.

Date: October 1, 2015

Respectfully submitted

/s/ Theodore Nkwenti  
Theodore Nkwenti, #16853  
The Franklin Law Group  
11120 New Hampshire Avenue  
Silver Spring, MD 20904

[bklawcenter@aol.com](mailto:bklawcenter@aol.com)  
Attorney for Debtor